

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, EASTERN DIVISION

CANDACE ALEXANDER

Plaintiff,

Vs.

CIVIL ACTION NO.: 1:25-CV-980-CLM

JAMEKA SCALES, COREY BENNETT,
PATRICK BENNETT and
VICKIE BENNETT,

Defendants.

MOTION FOR SUMMARY JUDGEMENT AND
MOTION TO DISMISS, PRESENTING DEFENSES OF FAILURE TO STATE A
CLAIM, LACK OF JURISDICTION UNDER RULE 12(B)

Comes now the Defendant, Patrick Bennett, and prays this Honorable Court will dismiss this frivolous cause of action based upon the following:

1. To dismiss the action because the complaint fails to state a claim against defendant upon which relief can be granted.
2. To dismiss the action on the grounds that the court lacks jurisdiction because the amount actually in controversy is less than ten thousand dollars exclusive of interest and costs.
3. Attached hereto and incorporated herein by reference is my Affidavit as Exhibit "A".
4. That Plaintiff sued me for actions between her husband and my brother and Defendant, Corey Bennett. She does not have standing to sue me over someone else's actions.
5. That there is no cause of action for the rantings in the Petition.
6. That this is a fraudulent case.
7. That my brother and Defendant, Corey Bennett, filed a criminal charge against Keith Alexander. The Plaintiff's entire case is due to her husband's criminal charge. I had nothing to do with the criminal charge.
8. I fear for my sister's mental health. It looks like an artificial intelligence pleading.

Respectfully submitted the 5th day of August 2025.


PATRICK BENNETT

STATE OF MISSOURI)
)
COUNTY OF ST. CHARLES)

AFFIDAVIT OF PATRICK BENNETT

Before me, a duly authorized Notary Public in and for the State of Missouri, did appear, Patrick Bennett, who, being personally known to me, did swear and affirm as follows:

My name is Patrick Bennett, I am over the age of nineteen (19) years and one of the Defendants in Civil Action No.: 1:25-CV-980-CLM, and I have personal knowledge of the matters set forth herein. I am a citizen of Wentzville, Missouri.

My sister is Candace Alexander, and she is married to Keith Alexander. Mr. Alexander harassed my brother, Corey Bennett, which led to my brother filing a criminal charge against Mr. Alexander in Tishomingo County State Court. My brother, Corey Bennett, did not file a criminal charge against the Plaintiff, Candace Alexander. I had nothing to do with the criminal charge.

Candace sued me in this case. I have done nothing to Candace. This is a frivolous case. I am worried about Candace's mental health.

There is no cause of action in this case. Candace is using the Court to harass me and my family. Please read the complaint. Candace's pleadings sound like they were generated by artificial intelligence.

I did not "attempted to influence Candace's legal response under false emotional pretenses" or act "as a proxy voice for Corey and Vickie".

The Plaintiff made the initial contact with me by adding me to a group text that included the Plaintiff, myself, as well as Defendants Corey Bennett, Jameka Scales, and Vickie Bennett. Prior to the Plaintiff, including me in a group text I had not been in contact with her for approximately 5 years or longer.

I did not contact the Plaintiff in "a coordinated maneuver to reinforce Defendant Corey Bennett's narrative, monitor Candace's emotional state, and gather reactive intelligence", as the Plaintiff stated in her complaint.

I did not call the Plaintiff "in a rehearsed, manipulative tone". I did not violate Mississippi, Alabama, and Missouri laws by "Tampering with or intimidating a witness", "Attempting to influence a witness's communication", or "Tampering with a witness in civil or criminal proceedings".

I was not involved in any "coordinated, timed, and targeted" campaign against the Plaintiff.

During the April 22, 2025, phone call with the Plaintiff, I did not use "financial and maternal suffering as leverage" for anything. Nor was I "emotionally coercive and exploitative". I did and do however, question the Plaintiff's mental clarity. I am worried about my sister's mental state at this time. As the Plaintiff stated in her own complaint, I did tell her that she had people who do care for and about her.

As the Plaintiff stated in her complaint, I chose to "remain silent in the group text". I instead attempted to reach out to her one on one. My silence in the group text did not "confirms alignment and proves his call was the setup; the affidavit was the punishment". I was simply worried about my sister and tried to speak to her and relay my concerns.

The Plaintiff does not even have standing to ask for what she is asking for. The Plaintiff needs a mental health evaluation.

Further Affiant sayeth not.

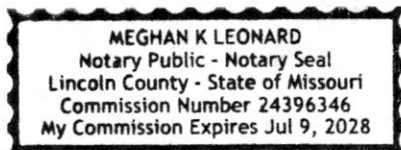

PATRICK BENNETT

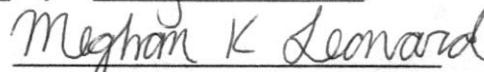
STATE OF MISSOURI)

COUNTY OF ST. CHARLES)

Before me, a notary public, in and for said county and said state, personally appeared **Patrick Bennett** who being known to me, and being by me first duly sworn, does depose and say that he has knowledge of the facts and matters stated in the above complaint and that said facts are true and correct according to the best of his knowledge, information, and belief.

Sworn to and subscribed before me this the 5th day of August, 2025.




NOTARY PUBLIC
My Commission Exp.: 7/9/28

22 CR 95 Patrick Bennett

Tishomingo, MS 38873

